

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Michelle Marie Wilson Case No. 16-07789 Chapter 7

All Cases: Moving Creditor PNC Bank, National Association Date Case Filed 03/07/2016

Nature of Relief Sought:  Lift Stay       Annul Stay       Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed \_\_\_\_\_

Chapter 7:  No-Asset Report Filed on \_\_\_\_\_

No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_ 04/05/2016

1. Collateral

a.  Home \_\_\_\_\_  
b.  Car Year, Make, and Model \_\_\_\_\_  
c.  Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$ 282,390.79

Total of all other Liens against Collateral \$ \_\_\_\_\_

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 214,625.00

5. Default

a.  Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

b.  Post-Petition Default  
i.  On direct payments to the moving creditor  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

ii.  On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

a.  Lack of Adequate Protection § 362(d)(1)  
i.  No insurance \_\_\_\_\_  
ii.  Taxes unpaid Amount \$ \_\_\_\_\_  
iii.  Rapidly depreciating asset \_\_\_\_\_  
iv.  Other (describe) \_\_\_\_\_

b.  No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c.  Other "Cause" § 362(d)(1)  
i.  Bad Faith (describe) \_\_\_\_\_  
ii.  Multiple Filings \_\_\_\_\_  
iii.  Other (describe) Foreclosure Sale held prior to Bankruptcy filing

d. Debtor's Statement of Intention regarding the Collateral  
i.  Reaffirm ii.  Redeem iii.  Surrender iv.  No Statement of Intention Filed

Date: 03/22/2016 /s/ Amanda J. Doyle  
Counsel for Movant

(Rev. 12/21/09)